

**GRADUATION:
The Measure of Tomorrow**

**Providing FAPE for
Students with Mental
Health Impairments**


Rachel B. Hitch
Rachel P. Nicholas
Schwartz & Shaw, PLLC.

PUBLIC SCHOOLS OF NORTH CAROLINA
State Board of Education | Department of Public Instruction


November 18-20, 2015

Introduction


- Our goal for today: Help you to be able to maneuver the unique challenges presented by educating students with mental health involvement in a manner that provides FAPE.



Introduction (cont.)



- This goal will be met through mastery of the following short-term objectives:
 - Participants will identify and discuss the unique challenges presented by students with disabilities who have mental health treatment involvement.
 - Participants will understand the legal issues associated with the unique challenges.
 - Participants and presenters will analyze these legal issues and review practical advice for dealing with them.
 - Participants will remember strategies for serving the unique needs of students with mental health related disabilities.



Introduction (cont.)

- It is important to recognize and address the challenges presented by this population of students to ensure that LEAs are providing these students FAPE in LRE.



Think-Pair-Share

- For the next 60 seconds, discuss with one another the challenges you have encountered in educating students with mental health impairments.

Think-Pair-Share

- Unique challenges are presented at every phase of providing special education to students from identification to evaluation, development of an appropriate IEP and placement.

BACKGROUND ON MENTAL HEALTH IN NORTH CAROLINA



GRADUATION:
The Measure of Tomorrow

65TH CONFERENCE ON EXCEPTIONAL CHILDREN

Background on Mental Health in North Carolina (cont.)

- According to the N.C. Division of MH/DD/SAS, there are 313,901 children in need of mental health services in North Carolina
- Local management entities (LMEs) are responsible for managing, coordinating, facilitating, and monitoring provision of mental health services in their service area.

Source: Rash and Dada, Mental Health, Developmental Disabilities, and Substance Abuse Services in North Carolina: A Look at the System and Who It Serves (2012), accessible at: http://www.ncdps.org/ncdps/infodocs/protectedinsight_article/mental_health_a_look_at_the_system.pdf

GRADUATION:
The Measure of Tomorrow

65TH CONFERENCE ON EXCEPTIONAL CHILDREN

Background on Mental Health in North Carolina (cont.)

- LME responsibilities include offering access to services all day every day, developing and overseeing providers, and handling consumer complaints and grievances.
- LMEs are the foundation for community-based services and can provide referrals to both public and private care providers.
- In 2010-11 there were 23 LMEs statewide. They merged with Managed Care Organizations (MCOs) and now there are 8.

Source: Rash and Dada, Mental Health, Developmental Disabilities, and Substance Abuse Services in North Carolina: A Look at the System and Who It Serves (2012), accessible at: http://www.ncdps.org/ncdps/infodocs/protectedinsight_article/mental_health_a_look_at_the_system.pdf

GRADUATION:
The Measure of Tomorrow

65TH CONFERENCE ON EXCEPTIONAL CHILDREN

Background on Mental Health in North Carolina (cont.)

- It used to be that nearly all community based mental health services were delivered by area mental health programs that were part of local government.
- The state reformed its system of delivering mental health services and now there is a regional system of management of private providers.
- The theory behind this reform was to give people greater choice in service providers.
- However, the system has been made more complicated and some believe the quality of services has suffered. There are fewer people served in state facilities.
- Some advocates of consumers say that providers are not willing to treat the most difficult consumers.

GRADUATION:
The Measure of Tomorrow

65TH CONFERENCE ON EXCEPTIONAL CHILDREN

Background on Mental Health in North Carolina (cont.)

- In 2011, it was estimated that 56% of children in need of mental health services in the state were receiving them.

Source: Rash and Doria, Mental Health, Developmental Disabilities, and Substance Abuse Services in North Carolina: A Look at the System and Who It Serves (2012), accessible at http://www.ncapple.org/files/childrensdevelopmentaldisabilities/mental_health_a_look_at_the_system.pdf

GRADUATION:
The Measure of Tomorrow

65TH CONFERENCE ON EXCEPTIONAL CHILDREN

"FINDING" STUDENTS WITH MENTAL HEALTH IMPAIRMENTS



GRADUATION:
The Measure of Tomorrow

65TH CONFERENCE ON EXCEPTIONAL CHILDREN

"Finding" Students with Mental Health Impairments (cont.)

• Identification

– Legal Overview

- LEAs have an **AFFIRMATIVE OBLIGATION** to identify, locate, and evaluate all children with disabilities or suspected of having disabilities ages 3-21 residing in the school district. See 34 C.F.R. 300.111; N.C. Gen. Stat. § 115C-107.3; NC 1501-2.9.
- The LEA's child find requirement applies to all children within the school district, including children who are homeless, in foster care, and children who attend private schools. See 34 C.F.R. § 300.111(a); NC 1501-2.9.
- A parent may also refer his/her child for evaluation to determine eligibility to receive special education services. See 34 CFR 300.301(b).

"Finding" Students with Mental Health Impairments (Cont.)

- Case Study: *Jana K. through her parent Tim K. of Hemet, CA v. Annville Cleona Sch. Dist.*, 39 F.Supp.3d 584 (M.D. Pa. 2014)

– The court found a child find violation and denial of FAPE in case involving eighth grade student exhibiting behaviors consistent with a need for special education and related services under the category of SED. Specifically, during the child's seventh grade year, she visited the nurse at least **54** times with various complaints, including illness/injury, hunger, peer conflict, nervousness, and anxiety. On numerous occasions, the nurse responded to the student by providing "moral support."

"Finding" Students with Mental Health Impairments (cont.)

- During the child's seventh grade year, she cut herself with a metal instrument which she thereafter swallowed. The school nurse observed scratches on the student's arms from "her cat and cutting," and treated the student by wrapping her arms in gauze. The school attributed the self-injurious behavior to an epidemic of cutting within the seventh grade class, and offered group sessions to address the behavior.

"Finding" Students with Mental Health Impairments (cont.)

- » The student had a couple of private evaluations completed which indicated diagnoses of depression and PTSD. These reports were never provided to the school system; however, the school system had knowledge that such assessment was being completed and never asked for a copy of the report. During the child's eighth grade year, she visited the nurse on 113 separate occasions, to which the nurse responded by providing "moral support." The student's performance continued to decline throughout her seventh and eighth grade year.
- » The court found that, the child's emotional issues, coupled with declining academic performance should have been enough for the school system to propose an evaluation.

"Finding" Students with Mental Health Impairments (cont.)

– Key Pitfall Mindsets to Avoid!

- "This child has engaged in some troublesome behaviors over the past several months or longer; however, the child can't be that bad off because she wasn't held back last year, and she is on track to advancing to the next grade next school year. She couldn't possibly qualify for special education services."



"Finding" Students with Mental Health Impairments (Cont.)

- Why is this mindset so wrong?
 - Even if a child is advancing from grade to grade, if a child is suspected of having a qualifying disability, she **must** be identified within a **reasonable time** after school officials are on notice of behavior that is likely to indicate a disability. See *Jana K. through her parent Tim K. of Hemet, CA v. Annville Cleona Sch. Dist.*, 39 F.Supp.3d 584 (M.D. Pa. 2014).
 - A school district's failure to timely evaluate a child whom it should reasonably suspect of having a disability constitutes a violation of the IDEA. *Id.*

"Finding" Students with Mental Health Impairments (cont.)

- "This child has been engaging in some problematic behaviors, but I know that the parent has had the child privately evaluated. If the child has a mental health diagnosis warranting a special education, then the parent would let the school know about the parent's concerns. It's not our responsibility to force services on the student."

– Why is this mindset so wrong?

- » Remember, schools have a "nondelegable responsibility" to identify, locate and evaluate children with disabilities or suspected of having disabilities.

See *Jana K. through her parent Tim K. of Hemet, CA v. Annville Cleona Sch. Dist.*, 39 F.Supp.3d 584 (M.D. Pa. 2014).

HOW DO MENTAL HEALTH ISSUES APPEAR IN SPECIAL EDUCATION?

SED ELIGIBILITY

ELIGIBILITY CONSIDERATIONS



ELIGIBILITY CONSIDERATIONS: A FEW GENERAL FACTS ABOUT SED



GRADUATION:
The Measure of Tomorrow

65TH CONFERENCE ON EXCEPTIONAL CHILDREN

Eligibility Considerations: A Few General Facts about SED

- States adopt their own IDEA eligibility criteria so long as the state criteria is *consistent with* the federal definition of SED.
- The differing state criteria make it difficult for any federal authority to reliably monitor the intersection of special education and mental health disorders (i.e., difficult to monitor the identification rates of children with SED).
- Children with conduct disorders are eligible in some states and not others. Conduct disorder, by several different studies, has been identified as the basis of identification for a large portion of SED identified students.
- Also, there are few reliable or valid measures to parse out the "cause" of misconduct (e.g., emotional disorder, behavior disorder, conduct disorder, conduct not caused by a disorder).

GRADUATION:
The Measure of Tomorrow

65TH CONFERENCE ON EXCEPTIONAL CHILDREN

Eligibility Considerations: A Few General Facts about SED (cont.)

- Other arenas where we see SED that may intersect with special education:
 - Center for Mental Health Services defines "emotional disturbance" to require presence of a Diagnostic and Statistic Manual (DSM) diagnosis which results in a functional impairment that substantially interferes or limits the child's role or functioning in family, school, or community activities.
 - Social Security Administration defines emotional disturbance for its eligibility purposes as the presence of a mental condition that can be medically proven and that results in marked and severe functional limitations of substantial durations.

A child identified under one or both of these definitions *MAY* be eligible for IDEA or Section 504 services, *BUT IS NOT AUTOMATICALLY ELIGIBLE.*

Source: Center for Effective Collaboration and Practice, Students with Emotional Disturbance: Eligibility and Characteristics, accessible at <http://dsep.org/etp/eng/theses/cescp/2009/efcp-hat.asp>

GRADUATION:
The Measure of Tomorrow

65TH CONFERENCE ON EXCEPTIONAL CHILDREN

Eligibility Considerations: A Few General Facts about SED (cont.)

- In comparison with other students, both with and without disabilities, children with emotional disturbance are more likely to be male, African American, and economically disadvantaged.
- Students identified as SED are usually identified later than those with other disabilities.
- They are more likely to live with one parent, in foster care, or in another alternative living arrangement.

Source: Center for Effective Collaboration and Practice. *Students with Emotional Disturbance: Eligibility and Characteristics*, accessible at <http://cecp.at.org/resources/2006/06/04/060401.asp>

ELIGIBILITY CONSIDERATIONS: DEFINING SED



Eligibility Considerations: Defining SED

• The Basics

- A "serious emotional disturbance" ("SED") is one of the thirteen categories of disability covered by IDEA. 34 C.F.R. 300.8(c)(4).
- In North Carolina, we call this "serious emotional disability" (also "SED"). N.C. Policies 1500-2.4(b)(5)
- Though the titles at the federal and state level are different, the terminology is interchangeable.

Eligibility Considerations: Defining SED (cont.)

- IDEA defines SED as a condition exhibiting **one or more of the following characteristics over a long period of time and to a marked degree that adversely affects a child's educational performance:**

- Inability to learn that cannot be explained by intellectual, sensory, or health factors;
- Inability to build or maintain satisfactory interpersonal relationships with peers and teachers;
- Inappropriate types of behavior or feelings under normal circumstances;
- General pervasive mood of unhappiness or depression; or,
- Tendency to develop physical symptoms or fears associated with personal or school problems.

Eligibility Considerations: Defining SED (cont.)

- "Long Period of Time":

- IDEA does not define "long period of time."
- Determination of whether something has occurred for a "long period of time" is subject to the professional judgment of the IEP team.
- Some discussions say that the duration must be long enough to be considered "chronic" as determined by sustained patterns, high frequency if over shorter periods, or multiple acute incidences.
- The behavioral history of the student should show that the behavior pattern is not a response to a situational crisis or a reaction to a transitory situation.
- Developmental level of student should be considered as a factor when considering what constitutes a "long period of time."
- Sources of helpful information to make this determination: developmental history, social history, school history, and anecdotal information regarding student's behavior at school, home, or in the community.

Eligibility Considerations: Defining SED (cont.)

- "Long Period of Time" (cont.):

- OSEP has stated that a generally acceptable definition of a "long period of time" is a range of two to nine months, assuming preliminary interventions have been implemented and proven ineffective during that period. *Letter to Anonymous*, 213 IDELR 247 (OSEP 1989), *See also R.B. v. Napa Valley Unified School District*, 48 IDELR 60 (9th Cir. 2007)(because child made significant improvements in her classroom behavior once she adjusted to her placement, her inability to maintain peer relationships did not persist for a long period of time).

Eligibility Considerations: Defining SED (cont.)

• "To a Marked Degree":

- IDEA does not define "to a marked degree."
- Generally, this refers to frequency, duration, or intensity of student's emotionally disturbed behavior in comparison to the behavior of his peers.
 - Frequency: number of occurrences of a given behavior over a given period of time.
 - Intensity: the relative strength, disruptiveness or intrusiveness of a given behavioral occurrence.
 - Duration: average amount of time that the student engages in a given behavioral occurrence.
- Can be indicative of either degree of acuity or pervasiveness. *Letter to Anonymous*, 213 IDELR 247 (OSEP 1989).

Eligibility Considerations: Defining SED (cont.)

• "Adverse Effect on Educational Performance":

- The student is not performing educational tasks according to his or her learning potential and age.
- Any IEP should consider "educational performance" to be a comprehensive term which includes both academic progress (progress in core academic subjects as measured by achievement tests, report cards, work samples, curriculum-based assessments, etc.) and social competence (adaptive and maladaptive behavior, adaptive functioning skills, and social skills). Educational performance reflects the total involvement of the student in the school environment.

Eligibility Considerations: Defining SED (cont.)

• Student Needs Specially Designed Instruction:

- LEA has a responsibility to utilize existing resources and strategies in the general education setting prior to initiating a special education referral.
- Specific research-based interventions must be implemented and documented in the general education setting.
- Supportive educational assistance should be provided for a sufficient period of time (DPI suggests 6-8 weeks) to modify the targeted behavior and should be evaluated to determine effectiveness.
- Student is considered to need specially designed instruction if he/she continues to manifest behaviors consistent with the definition despite the interventions.

Eligibility Considerations: Defining SED (cont.)

• Student Needs Specially Designed Instruction (cont.):

- The fact that a student with SED receives good grades will not necessarily disqualify the student from IDEA eligibility. The team should consider factors such as attendance, ability to earn required credits, and changes in grades.
- Student who was provided homebound for two months when she became too fearful to attend school should have been deemed eligible because of her prolonged absence and failure to earn enough credits to move on to the next grade. *M.M. and I.F. v. New York City Department of Education*, 63 IDELR 156 (S.D.N.Y. 2014).

Eligibility Considerations: Defining SED (cont.)

• "Inability to Make Educational Progress that Cannot be Explained by Intellectual, Sensory, or Health Factors":

- Step 1: The primary issue for the IEP team to determine here is if the student is making "educational progress" according to his or her individual learning capabilities.
 - Factors:
 - Is the student progressing at the same rate as his or her peers?
 - If yes, is the student progressing according to his or her learning abilities?
- Step 2: If the IEP team determines that the student is not making educational progress, it must next rule out intellectual, sensory and health factors as the primary cause of the inability.

Eligibility Considerations: Defining SED (cont.)

• "Inability to Build and Maintain Satisfactory Interpersonal Relationships with Peers and Teachers":

- To meet this measure, sufficient evidence from multiple sources should support that the student's deficits in social competence impair his/her ability to build and maintain satisfactory interpersonal relationships with others.
- Characteristic must be present at an unacceptable level across various environments.
- A problem with a particular teacher, peer or group does not qualify a student for SED eligibility.
- Examples of circumstances supporting a determination that the student is unable to build and maintain satisfactory interpersonal relationships with peers and teachers include:
 - Extreme social withdrawal
 - Poor reality testing
 - Aggressive behaviors

Eligibility Considerations: Defining SED (cont.)

• "Inappropriate Types of Behaviors or Feelings Under Normal Circumstances":

- Does not have to be bizarre, dangerous, psychotic, or delusional to be inappropriate.
- Some courts have held that the critical inquiry is whether the child's reactions to everyday occurrences (e.g., teasing, frustration) were appropriate when considered in relation to how the child's peers would react.
- Some courts have held that to qualify as SED, a student's behavior problems have to be unusually serious as compared to the majority of the student's peers, and present a significant impediment to learning.

Eligibility Considerations: Defining SED (cont.)

• "Inappropriate Types of Behaviors or Feelings Under Normal Circumstances" (cont.):

- OSEP says the behavior should be atypical and there is no observable reason for it.
- Running away from a stressful situation is not inappropriate behavior.
- Hanging out of a third-story window by a bed sheet or cutting off one's own fingertip with a hatchet upon hearing of the death of a former friend's father has been held to be inappropriate behavior under normal circumstances.

Eligibility Considerations: Defining SED (cont.)

• "Inappropriate Types of Behaviors or Feelings Under Normal Circumstances" (cont.):

- Behavior Examples:
 - Overreaction to environmental stimuli
 - Obsessive or compulsive behaviors
 - Bizarre verbalizations
 - Inappropriate sexualized behaviors
- Let's Talk About Feelings
 - Subjective
 - Difficult for IEP team to base determination on feelings alone
 - When determination is made on feelings alone, it is important for there to be consensus among IEP team members based on documented evidence of persistent and significant inappropriate feelings
 - Helpful assessment tools: clinical interviews, objective and projective psychological tests

Eligibility Considerations: Defining SED (cont.)

• "General Pervasive Mood of Unhappiness or Depression":

- Student is not required to meet the DSM criteria for major depression in order to have a general pervasive mood of unhappiness or depression. *See, e.g., Los Angeles Unified School District, 107 LRP 27850 (SEA CA 2007).*
- BUT, the lack of such a diagnosis may raise an issue about whether the student is depressed enough to qualify for services based on a pervasive mood of unhappiness or depression. *See, e.g., Conejo Valley Unified School District, 507 IDELR 213 (SEA CA 1985).*
- A general pervasive mood of unhappiness or depression may be determined through behavior of student:
 - Withdrawal from friends
 - Frequent crying
 - Markedly diminished interest in activities
 - Depressive affect
 - Suicidal thoughts
- Additional services, for example school counseling or referral for mental health services, should be considered if it is suspected that the child is suffering from depression.

Eligibility Considerations: Defining SED (cont.)

• "Tendency to Develop Physical Symptoms or Fears Associated with Personal or School Problems":

- It is common for students to react to stress with physical symptoms, at times.
- To meet this criteria, the symptoms must be chronic and provide a significant interference with learning.
- Physical responses may be considered as long as there is reasonable evidence that they have a psychosomatic origin.
- Efforts to reduce the symptoms of these fears are appropriate prior to consideration of a referral for special education.

Eligibility Considerations: Defining SED (cont.)

Eligibility Is Not In A Name

- A diagnosis alone does not make a student eligible under SED.
- According to the National Alliance on Mental Illness (North Carolina), however, the following mental health diagnoses are often linked with SED: Attention Deficit Hyperactivity Disorder (ADHD); Oppositional Defiant Disorder (ODD); Conduct Disorder; Depression; Bipolar Disorder; Anxiety Disorders; Schizophrenia; Suicide.

- Source: <http://naminc.org/nm/publications/SED.pdf>

Eligibility Considerations: Defining SED (cont.)

• Social Maladjustment

- Long history of controversy over this exclusion from SED eligibility.
- Neither the IDEA nor its implementing regulations provide a definition for the term "social maladjustment."
- U.S. Dept. of Ed. was asked to provide a definition in the regulations but declined to do so, concluding that "there is no consensus" on a definition. 71 Fed. Reg. 46, 550 (2006).
- Courts have struggled with a definition:
 - "We do not believe, however, that the analysis can be limited to a stark distinction between unwillingness and inability to behave appropriately. There is a grey area between normal, voluntary conduct and involuntary physiological response, and that area is where Congress has chosen to locate behavioral problems such as A.C.'s." *Independent School District No. 284 v. A.C.*, 35 IDELR 59 (8th Cir. 2001).
 - In *Hansen v. Republic R-III School District*, 56 IDELR 2 (8th Cir. 2011), the court found that the behaviors were social maladjustment and not SED because the student was able to control his behavior, or "turn it on and off."

Eligibility Considerations: Defining SED (cont.)

• Social Maladjustment

- Some professionals have advocated for use of the DSM classification system for identifying social maladjustments – internalized emotional problems are SED and externalized behavior/conduct problems are social maladjustment.
- Others reject that suggestions and advocate for the use of behavioral checklist or rating scales to differentiate social maladjustment from SED.
- We in the field are very aware that it is incredibly difficult to separate the internal and the external problems, and that SED is often manifested in conduct.
- Comprehensive multi-faceted evaluation should be the primary consideration in making the SED determination.
- Diagnoses do not, alone, determine eligibility.

Eligibility Considerations: Defining SED (cont.)

• Social Maladjustment

- It has been noted that "[a]dolescence is a time of social maladjustment and teenagers are a wild and unruly bunch. Equating simple bad behavior with a serious emotional disturbance enlarges the burden IDEA places on state and local education authorities." *In re Student with a Disability*, 112 LRP 5256 (SEA NM 1/17/12).
- If a properly composed IEP team reviewing a proper evaluation determines that the child meets the SED criteria, it is irrelevant if there are also maladjusted behaviors.
- Best way to read the maladjustment language: if you remove the maladjusted behaviors and the child still has at least one of the identifying characteristics and meets the four considerations, he or she is eligible under SED.

Eligibility Considerations: Defining SED (cont.)

• Social Maladjustment

- In *Springer v. Fairfax County School Board*, 27 IDELR 367 (4th Cir. 1998), the student was merely socially maladjusted where he began stealing, sneaking out of his house, skipping school, and using marijuana and alcohol in 11th grade. Student continued to score well on standardized tests, but his grades suffered due to skipping class and failure to complete assignments.
- In *Hansen v. Republic R-III School District*, 56 IDELR 2 (8th Cir. 2011), student with bipolar disorder had multiple disciplinary referrals over several years for threatening students and teachers, fighting, and disrespect of teachers and peers. Student did poorly in class and on standardized tests. Student was found to be SED, not just maladjusted, based on inability to build or maintain satisfactory relationships.

Eligibility Considerations: Defining SED (cont.)

• Social Maladjustment

- Teen in *H.M. v. Weakley County Board of Education*, 65 IDELR 68 (W.D. Tenn. 2015) frequently skipped school, refused to complete assignments, and was described by adults as "manipulative." However, she also displayed a general pervasive mood of unhappiness or depression. She had a history of severe major depression dating back to elementary school. She was deemed eligible for services despite her social maladjustment.
- The fact that a student has a turbulent relationship with his parents or engages in problem behaviors at home will not in itself qualify the student as SED. Assuming no adverse impact on educational performance, out-of-school behavior is not a basis for eligibility, no matter how serious.

Eligibility Considerations: Defining SED (cont.)

• Social Maladjustment

- Student who engaged in violent temper tantrums at home, but whose academic performance was solid and behavior was generally good at school, was not eligible since her educational performance was not adversely impacted. *G.H. v. Great Valley School District*, 61 IDELR 63 (E.D. Pa. 2013).
- Student who endured years of sexual abuse by a relative exhibited behavior that stemmed from drug use and was more akin to social maladjustment than SED. *Mr. and Mrs. N.C. v. Bedford Central School District*, 51 IDELR 149 (2d Cir. 2008, unpublished).
- High schooler with a history of angry outbursts and sadness was not eligible under IDEA because the student understood and was able to cope with his feelings and was not depressed. *In re Student with a Disability*, 53 IDELR 339 (SEA NY 2009).

Eligibility Considerations: Other Factors

Eligibility Considerations: Other Factors

- Mood, behavior, or academic problems related solely to drug abuse do not qualify a student as a child with an emotional disturbance.
- Students whose psychological conditions impede their ability to interact with other students may be more likely to be eligible under SED, even where academic performance is acceptable, where the condition impacts the student's ability to adapt to a school environment.
- For example, student whose fear of bullying prevented her from attending school qualified her as SED even though she received straight A's in her homebound placement.
- Student with social maladjustment could be covered under Section 504 if the student has been diagnosed with a disorder that substantially limits him/her in a major life activity.
- OHI – some students not eligible as SED might be eligible under OHI (e.g., depression as causing limited alertness and vitality).

Eligibility Considerations: Other Factors (cont.)

Parent Withholding Information

- Because of the nature of the disorders and behaviors associated with mental health issues, in this arena, parents may be reluctant to provide information to the school.
- Pointer: What should you do when the parent withholds key information during the evaluation process?
 - The IEP team should make eligibility determinations based upon the information made available to the team at the time.
 - See [Student] v. Winston-Salem/Forsyth Cnty. Bd. of Educ., 14-EDC-06398, at *22 (NC OAH, Feb. 27, 2015) (aff'd on appeal May 1, 2015); Petitioner claimed that the school failed to provide the student FAPE because the student's IEP did not include any goals to address the student's anxiety disorder. However, the school did not have any real knowledge about the student's mental health need until this was introduced into evidence at the due process hearing.

Eligibility Considerations: Other Factors (cont.)

Parent Withholding Information

- An IEP team can only make decisions based on the information about the child that is available at the time of a meeting.
- Parent participation in the development of the IEP is expected before they can fairly argue that the best the school authorities had to offer was or is not good enough.
- Make it clear that you are only gathering the information needed, not gathering information to cause embarrassment; reinforce confidentiality requirements.

Eligibility Considerations: Other Factors (cont.)

Parent Withholding Information

- "[T]he critical pre-requisite is that the parents must have cooperated with the school authorities . . . to try to develop the IEP." See *[Student] v. Winston-Salem/Forsyth Cnty. Bd. of Educ.*, 14-EDC-06398, at *22 (NC OAH, Feb. 27, 2015) (quoting *S.M. V. Weast*, 240 F.Supp.2d 426, 436 (D.Md. 2003) (*aff'd on appeal*, May 1, 2015)). "A parent may not withhold critical information from the IEP team and then claim that FAPE was not provided." *Id.*

IDEA EVALUATIONS FOR STUDENTS WITH MENTAL HEALTH DISORDERS

• Required screenings and evaluations:

- Hearing screening;
- Vision screening;
- Two scientific research-based interventions to address behavioral/emotional skill deficiency and documentation of the results of the interventions, including progress monitoring documentation;
- Summary of conference(s) with parents or documentation of attempts to conference with parents;
- Communication evaluation;
- Review of existing data;
- Social/developmental history;
- Observation across settings, to assess academic, functional, and behavioral skills;
- Educational evaluation;
- Psychological evaluation, to include an intellectual evaluation; and,
- Behavioral/emotional evaluation which may include a behavior/emotional skill rating.

IDEA EVALUATIONS FOR STUDENTS WITH MENTAL HEALTH DISORDERS (cont.)

- The evaluation of behavioral-emotional functioning must be conducted by a certified or licensed psychologist to document maladaptive behaviors or deficits in coping skills and emotional functioning.
- Behavioral-emotional evaluation includes information about the unique personal attributes of the student and describes any distinctive patterns of behavior which characterize the student's personal feelings, attitudes, moods, perceptions, thought processes, and significant personality traits.
- Evaluation shall include:
 - Interview with the student;
 - Checklist or rating scales; and,
 - Screening data and any other observational data.

IDEA EVALUATIONS FOR STUDENTS WITH MENTAL HEALTH DISORDERS (cont.)

- Educational Evaluation
 - Can be conducted by psychologist, special educator, or other trained professional;
 - Shall include assessment of:
 - Learning environment, including curriculum and task demands;
 - Academic strengths and weaknesses, including written and oral language and information from individualized achievement assessment;
 - Present levels of academic functioning; and
 - Vocational needs for students age 14 and older.
- Psychological Evaluation
 - Shall be conducted by a certified or licensed psychologist.
 - Includes:
 - Interviews with student
 - Learning history
 - Behavior observations with special consideration given to evaluation of disorders of thought, memory, judgment, and/or time-place orientation, as appropriate.
 - Individual intellectual evaluation shall be given when academic or learning deficits or giftedness is suspected.

IDEA EVALUATIONS FOR STUDENTS WITH MENTAL HEALTH DISORDERS (cont.)

- Social/Developmental History
 - Documents normal and abnormal developmental events and includes a review of information obtained during the screening process.
 - May be completed by a certified social worker, special educator, psychologist, counselor, or other appropriate person.
- Communication Evaluation
 - Shall be conducted by speech/language pathologist.
 - Includes assessment of student's expressive language skills, receptive language skills, and pragmatics or social language use.

PROVIDING FAPE

Providing FAPE: FAPE Standard

- FAPE requires an LEA to provide a disabled student with educational instruction that is designed to meet the unique needs of the student through an IEP that is reasonably calculated to enable the student to receive educational benefit. See *Hendrick Hudson Bd. of Educ. v. Rowley*, 458 U.S. 176, 188-89 (1982); *MS. Ex rel. Simchich v. Fairfax County Sch. Bd.*, 553 F.3d 315, 320 (4th Cir. 2009).
- Schools are not required to maximize a child's potential, *Rowley* at 197, "furnish[] every special service necessary to maximize each handicapped child's potential," *Hartmann v. Loudoun County B., of Educ.*, 118 F.3d 996, 1001 (4th Cir. 1997) (quoting *Rowley*, 458 U.S. at 199-200), nor employ a specific methodology in educating a student. See *Rowley*, 458 U.S. at 206-208.

Providing FAPE: A Brief Background of the Individuals With Disabilities Act ("IDEA")

- FAPE Standard (cont.)
 - However, a school must provide a specially designed instruction and related services "sufficient to confer some educational benefit upon the handicapped child," *Hartmann v. Loudoun County B., of Educ.*, 118 F.3d 996, 1001 (4th Cir. 1997) (quoting *Rowley*, 458 U.S. at 199-200), and "personalized instruction with sufficient support services to permit the child to benefit educationally from that instruction." *Burke County Bd. of Educ. V. Denton*, 895 F.2d 973, 980 (4th Cir. 1990) (quoting *Rowley*, 458 U.S. at 203).



Providing FAPE: Developing an Appropriate IEP

- Key Provision of an IEP:
 - PLAAFP
 - IEP must describe how the child's disability affects the child's involvement and progress in the general education curriculum. 34 CFR § 300.320
 - Measurable Annual goal, including academic and functional goals
 - Designed to meet the child's needs that result from the child's disability to enable the child to be involved in and make progress in the general education curriculum and meet each of the child's other educational needs that result from the child's disability

Providing FAPE: Developing an Appropriate IEP (cont.)

- Progress monitoring
 - Statement of the special education and related services and supplementary aids and services, based on peer-reviewed research to the extent practicable to be provided to the child, or on behalf of the child, and a statement of the program modifications or supports for school personnel that will be provided to enable the child to advance appropriately toward attaining the annual goals; to be involved in and make progress in the general education curriculum and to participate in extracurricular and other nonacademic activities; and be educated and participate with other children with disabilities and nondisabled children in the activities described in this section; if the child takes alternate assessment, a statement why the child cannot participate in the regular assessment and the particular alternate assessment selected is appropriate for the child

Providing FAPE: Developing an Appropriate IEP (cont.)

- Pointer: Do schools have to comply with a parent's insistence on a particular methodology?
 - No! Rule: "Instructional methodology, identity of teaching personnel, and qualifications and training of personnel are not decisions of the IEP team and there is no requirement or expectation that this information be included in an IEP." *[Student] v. Winston-Salem/Forsyth Cnty. Bd. of Educ.*, 14-EDC-06398, at *20 (NC OAH, Feb. 27, 2015) (citing *S.M. v. Hawari Dept. of Educ.*, 808 F. Supp.2d 1269 (D. Haw. 2011); *I.L. v. v. Mercer Island Sch. Dist.*, 592 F.3d 938 (9th Cir. 2010) (*aff'd on appeal*)).

Providing FAPE: Developing an Appropriate IEP (cont.)

- Pointer: Do schools have to comply with a parent's insistence on a particular methodology? (cont.)
 - "The law is well-settled that instructional methodology, identity of teaching personnel, and qualifications and training of personnel are **administrative decisions left to educational professionals**, and are not decisions to be made with or by the parent through the IEP team process. Further, notwithstanding Petitioners' feelings about the District's educational program or personnel, lack of trust is not an element of FAPE." *Id.* citing 34 CFR § 300.17; 34 CFR § 104.33 (emphasis added).

Providing FAPE: Developing an Appropriate (cont.)

- In this case, the parents of an 18-year-old high school student with severe reading deficiencies rejected an IEP because, while the parents did not dispute the goals provided on the IEP, the parents did not "trust" the district to implement the goals. Specifically, the parents did not believe that the district had the training and capacity to implement the goals, accommodations, and modifications in the IEP.



Providing FAPE: Behavior Intervention Plans

- Behavior Intervention Plan ("BIP")
 - » A behavior intervention plan is a set of positive behavioral interventions and supports, along with other strategies, designed to assist a student whose behavior impedes his own learning or the learning of others. A BIP may also be referred to as a "behavior management plan" or "behavioral support plan." Although the IDEA requires districts to consider the need for positive behavioral interventions when a student's behavior impedes learning, it provides limited guidance as to when a BIP is required and does not provide any guidance as to the format or content of a BIP.



- Not defined in IDEA

Providing FAPE: Behavior Intervention Plans (cont.)

- Behavior Intervention Plans: Are they required for students with ED Designations?
 - If a child has a behavior that impedes the child's learning or that of others, the Team must **consider** the use of positive behavioral interventions and supports, and other strategies to address that behavior. 34 CFR § 300.324.
 - *R.K. by her parents R.K. and S.L., v. New York City Department of Educ.*, 56 IDELR 212 (Mar. 28, 2011) (affirming magistrate judge's report that district denied 5-year-old FAPE when it failed to include a behavior plan in her IEP when student engaged in inappropriate vocalizations and had an inability to focus. Court affirmed the magistrate's ruling that the proper inquiry in determining the necessity of an FBA is whether the behavior impedes learning, not whether the behavior is atypical.)

PLACEMENT CONSIDERATIONS

Placement Considerations: Least Restrictive Environment

IDEA'S LRE AND

CONTINUUM REQUIREMENT

- Definition
 - LEAs must ensure that, to the maximum extent appropriate, children with disabilities are educated with children who are nondisabled. To this end, an LEA must ensure that a continuum of alternative placements (i.e., instruction in regular classes, special classes, special schools, home instruction, and instruction in hospitals and institutions along with providing appropriate supplementary services in conjunction with regular class placement) is available to meet the needs of children with disabilities for special education and related services. See 34 CFR 300.115.
 - Regular Education Setting: 80% or more of the day with nondisabled peers
 - Resource: 40%-79% of the day with nondisabled peers.
 - Separate: 39% or less of the day with nondisabled peers
 - Separate School
 - Residential

Placement Considerations: Least Restrictive Environment (cont.)

- Special classes, separate schooling, or other removal of children with disabilities from the regular educational environment should occur only if the nature or severity of the disability is such that education in regular classes with use of supplementary aids and services cannot be achieved satisfactorily. 34 CFR § 300.114.
- A child's placement **must** be determined at least annually, **be based on the child's IEP**, and be as close as possible to the child's home. 34 CFR § 300.116
- In selecting the LRE, consideration must be given to any potential harmful effect on the child or on child or on the quality of services that he or she needs. 34 CFR § 300.116



Placement Considerations: Least Restrictive Environment (cont.)

- Pitfall: Predetermining a more restrictive placement for a student prior to considering lesser restrictive placements.

• "In implementing Part B's LRE provision, [], IEP and placement teams must give first consideration to placement of a disabled student in the regular classroom with appropriate aids and services before a more restrictive placement can be considered. In determining whether regular class placement would be appropriate for an individual disabled student, the team must thoroughly consider the full range of supplementary aids and services, in light of the student's abilities and needs, that could be provided to facilitate the student's placement in the regular educational environment. Following this individual inquiry, if a determination is made, in accordance with Part B requirements at 34 CFR § § 300.340-300.350 and 300.550-300.552 and 300.533, that the IEP for a particular disabled student could not be implemented satisfactorily in the regular educational environment, even with the provision of supplementary aids and services, regular class placement would not be the LRE placement for that student." *Letter to Cohen*, 25 IDELR 516 (OSEP Aug. 6, 1996)

Placement Considerations: Least Restrictive Environment (Cont.)

- Pitfall: Predetermining a more restrictive placement for a student prior to considering lesser restrictive placements. (cont.)
- "However, OSEP does not interpret Part B's LRE provision to require that a disabled student actually be placed in the regular classroom and fail before a more restrictive placement is considered." *Letter to Cohen*, 25 IDELR 516 (OSEP Aug. 6, 1996)



Placement Considerations: Least Restrictive Environment (cont.)

– Example of Proper Determination of Placement

- In re: Student with a Disability Indiana State Educational Agency, 114 LRP 51031 (Sep. 24, 2014)
 - Student (nine year old third grader) exhibited the following behaviors in the school setting: yelling, pretend crying, getting out of her seat, not complying with directives and being physical with peers, causing the student to be frequently removed from the classroom. Upon the completion of a FBA, the IEP team determined that student was eligible to receive a special education under the category of emotional disability received special education services under the category of emotionally disabled during the 2013-2014 school year in a regular education setting.

Placement Considerations: Least Restrictive Environment (cont.)

- After the development of her IEP in September of 2013, student's behaviors began to escalate, striking students and staff more. As a result, she completed much of her academic work in an individual space outside the general education classroom. Her behaviors were less severe under this arrangement. The LEA convened an IEP meeting (without the parent, after the parent refused to attend the meeting) in March of 2014 to revisit the student's services and placement. The team (after having increased her services in January of 2014) changed the determination that the appropriate setting for the student was in a separate setting.

Placement Considerations: Least Restrictive Environment (cont.)

- In re: Student with a Disability Indiana State Educational Agency, 114 LRP 51031 (Sep. 24, 2014) (cont.)
 - The court held that the student's placement in the separate setting was appropriate as it was apparent to the IEP Team that the student's lagging skills cannot be addressed adequately in the general education setting.

Placement Considerations: Least Restrictive Environment (cont.)

- What to do when the parent pulls the child from the school system, has the child placed in a private school, and requests reimbursement?
 - If the placement determined by the IEP team is an appropriate placement, then maintain this position! If you decide to place the student in an inappropriate setting due to parental pressure and the child does not make adequate progress in that inappropriate setting, then you are on the hook for IDEA violation!



Placement Considerations: Least Restrictive Environment (cont.)

- Standard: "If the parents of a child with a disability, who previously received special education and related services under the authority of a public agency, enroll the child in a private [school] without the consent of or referral by the public agency, a court or a hearing officer may require the agency reimburse the parents for the cost of that enrollment if the court or hearing officer finds that the agency had not made FAPE available to the child in a timely manner prior to that enrollment and that the private placement is appropriate. A parental placement may be found to be appropriate by a hearing officer or a court even if it does not meet the State standards that apply to education provided by the SEA and LEAs." 34 CFR § 300.148(c).



Placement Considerations: Least Restrictive Environment (cont.)

- However, reimbursement may be reduced or denied if, at the most recent IEP meeting attended by the parents before the child's removal from the district, the parents did not inform the IEP team that they were rejecting the placement proposed by the public agency to provide FAPE to their child, including stating their concerns and their intent to enroll their child in a private school at public expense; or at least ten business days prior to the removal of the child from the public school, the parents did not give written notice to the public agency, if, prior to the parents' removal of the child from the public school, the public agency properly informed the parents of its intent to evaluate the child, including a statement that the purpose of the evaluation that was appropriate and reasonable, but the parents did not make the child available for the evaluation, or upon a judicial finding of unreasonableness with respect to actions taken by the parents. 34 CFR § 148.

Placement Considerations: Least Restrictive Environment (cont.)

- Note that, there are exceptions to this: reimbursement must not be reduced or denied if the school prevented the parents from providing the notice, the parents had not received proper notice of this notice requirement through procedural safeguards handbook, or compliance with the notice requirement would have resulted in physical harm to the child; and in the discretion of the court may not be reduced or denied if the parents are not literate or cannot write in English or compliance with the notice requirement would likely result in serious emotional harm to the child. 34 CFR § 300.148.

Placement Considerations: Least Restrictive Environment (cont.)

- See *[Student] v. Winston-Salem/Forsyth Cnty. Bd. of Educ.*, 14-EDC-06398 (NC OAH, Feb. 27, 2015) (*aff'd on appeal*).
 - In this case, the parents of an eighteen-year-old student, with severe reading deficiencies and some circumstantial anxiety issues filed a due process petition against the school system seeking reimbursement for the student's placement in a private school. The student last attended school in the district in June of 2011. After withdrawing from the district to attend outside private schools, and after filing a DP petition in 2012, the district agreed to arrange for a re-evaluation of the student in the summer of 2013 and to develop an IEP for the student for the 2013-2014 academic year based upon the results of the evaluation, including an assistive technology assessment and a psychological-educational assessment.

Placement Considerations: Least Restrictive Environment (cont.)

- The IEP team convened twice to review these results and to develop an IEP based upon the evaluation. The IEP team developed an IEP with an array of accommodations and modifications including assistive technology, 90 minutes of one-on-one special education instruction, and research-based methodology. Upon developing the services, the team considered the continuum of placements.

Placement Considerations: Least Restrictive Environment (cont.)

- The team first considered regular education, and rejected it because it did not provide enough special education to meet the child's needs. The team rejected a separate or residential placement because it would be too restrictive and not allow enough time to access the general curriculum or typically developing peers. The team determined resource level of special education services would be appropriate. The parents objected to this setting because they did not believe the school system had staff capable of providing the services listed on the IEP and on the basis that their child would be stigmatized because he required accommodations.

Placement Considerations: Least Restrictive Environment (cont.)

- While the results of the student's evaluation indicated that the student needed specially designed instruction, none of the evaluations indicated that a residential setting was appropriate for the student. At the second IEP meeting (September 2013), the family informed the IEP team that the student was enrolled in a private school, and would not be attending school within the district. The parents sought reimbursement for the private school enrollment.

Placement Considerations: Least Restrictive Environment (cont.)

- Holding: the petitioners failed to establish that the district failed to provide FAPE; therefore the tuition reimbursement claim was denied. See [Student] v. Winston-Salem/Forsyth Cnty. Bd. of Educ., 14-EDC-06398, at *22-23 (NC OAH, Feb. 27, 2015) (*aff'd on appeal*).
- ALJ also found that the reimbursement claim was barred because Petitioners did not provide ten-day notice. *Id.* at 23

Placement Considerations: Least Restrictive Environment (cont.)

- One of the big issues in serving these children can be the intensity of their needs and finding appropriate placements.
- Of the disabilities identified in IDEA, SED is the disability that may be most likely to require a residential placement.

Placement Considerations: Least Restrictive Environment (cont.)

- IDEA obligates school districts to provide a continuum of alternative placement options for eligible children with disabilities.
- This continuum includes public and private residential facilities.
- In 2005, over 34,000 students were served under the IDEA in public and private residential facilities.

Placement Considerations: Least Restrictive Environment (cont.)

- These placements are expensive, sometimes exceeding \$100,000 for one school year for one child.
- If placement in a public or private residential program is necessary to provide special education and related services to a child with a disability, the program, including non-medical care and room and board, must be at no cost to the parents of the child.

Placement Considerations: Least Restrictive Environment (cont.)

- Residential placement is the school system's responsibility IF:
 - The IEP team determines that a residential placement is the least restrictive appropriate environment in which the student can be served
 - OR
 - Parent unilaterally places student in a residential facility, *primarily for educational purposes*, following a determination that the LEA did not offer the student FAPE.

65TH CONFERENCE ON EXCEPTIONAL CHILDREN

Placement Considerations: Least Restrictive Environment (cont.)

- Residential placement is *only* to provide the student with a meaningful educational benefit that the public school is unable or unwilling to supply.
- **NOT** to provide treatment services, address behavior problems at home, and address social maladjustment.

65TH CONFERENCE ON EXCEPTIONAL CHILDREN

Placement Considerations: Least Restrictive Environment (cont.)

- No uniform national standard to determine whether IDEA requires the district to pay for a residential placement that is required to treat a child's mental health illness or medical needs.
 - Whether the child's mental health needs are "inextricably intertwined" with educational needs
 - Whether the residential placement is "primarily oriented" toward serving the educational needs
 - Whether the residential placement would have been necessary "quite apart from" the child's educational needs
 - Whether the residential facility offers state-accredited special education

65TH CONFERENCE ON EXCEPTIONAL CHILDREN

Placement Considerations: Least Restrictive Environment (cont.)

- "Inexplicably Intertwined"
 - 2nd Circuit, sometimes 3rd Circuit, 4th Circuit, 6th Circuit, 8th Circuit, and D.C. Circuits.
 - LEA bears cost of residential placement if child's medical, social, or emotional problems are "inextricably intertwined" with the learning process. If the medical needs are "inextricably intertwined" with the educational needs, the school pays for the cost of the entire treatment.
 - This is the broadest standard.
 - Courts applying this standard ask whether the treatment might improve the child's educational prospects.

Placement Considerations: Least Restrictive Environment (cont.)

- "Primarily Oriented"
 - 5th and 7th Circuits
 - LEA bears the cost of the residential placement if the placement is (1) essential for the child to receive meaningful educational benefit and (2) "primarily oriented" towards enabling the child to receive an education.
 - Essentially, this standard analyzes whether the placement was primarily driven by the child's educational needs.

Placement Considerations: Least Restrictive Environment (cont.)

- "Quite apart from"
 - 9th and sometimes 3rd Circuits
 - LEA bears the cost of the residential placement if the placement is necessitated by the child's educational needs; LEA does not bear the cost of the residential placement if the placement would have been necessary "quite apart from" those needs.
 - The focus under this standard is the initial reason for residential placement.
 - Put another way, courts applying this standard will often ask whether the treatment would have been necessary if education was not a consideration.

Placement Considerations: Least Restrictive Environment (cont.)

- State-accredited special education services
 - 10th Circuit
 - LEA bears the cost of the residential placement if:
 - the placement is reasonably calculated to enable the child to receive educational benefit;
 - LEA failed to provide FAPE;
 - Placement is a state-accredited school;
 - School provides individually designed instruction (special education);
 - School provides additional services beyond special education and those services can be characterized as "related services" under IDEA.
 - Focus is not the initial motivation behind the placement.

 GRADUATION:
The Measure of Tomorrow

65TH CONFERENCE ON EXCEPTIONAL CHILDREN

Placement Considerations: State Mental Health Treatment Facilities

- State Psychiatric Hospitals
 - Broughton Hospital in Morganton
 - Central Regional Hospital in Butner
 - Cherry Hospital in Goldsboro
 - Dorothea Dix fell into this category but it has been closed
- Developmental Centers
 - Caswell Developmental Center in Kinston
 - J. Iverson Riddle Developmental Center in Morganton
 - Murdoch Developmental Center in Butner

 GRADUATION:
The Measure of Tomorrow

65TH CONFERENCE ON EXCEPTIONAL CHILDREN

Placement Considerations: State Residential Programs for Children

- Two state-operated facilities that offer residential programs for students with serious emotional and behavioral disorders.
 - The Wright School – Durham – serves 62 children aged 6-12.
 - The Whitaker School – Butner – serves 54 children aged 13-17. Long-term treatment program for emotionally handicapped adolescents. Converted into a psychiatric residential treatment facility (PRTF) so that services there can be covered by Medicaid.

 GRADUATION:
The Measure of Tomorrow

65TH CONFERENCE ON EXCEPTIONAL CHILDREN

Placement Considerations: State Residential Programs for Children (cont.)

- The Wright School
 - Typical child at the Wright School, as of 2012, had three psychiatric diagnoses, took three psychotropic medications, and had two hospitalizations in the previous year.
 - The staff-student ratio is 2:8.
 - Historically, very low staff turnover.
 - Parent satisfaction surveys report an average of 90% or higher each year satisfied with services.

Placement Considerations: State Residential Programs for Children (cont.)

- The Wright School (cont.)
 - 2006 study of The Wright School published in *Behavioral Disorders* found that children with very serious problems from families facing multiple challenges made substantial improvement and maintained the improvement for at least six months postdischarge.

APPLICATION OF TODAY'S CONCEPTS

Applying Your Knowledge

HYPOTHETICALLY SPEAKING

HYPOTHETICAL: You are reviewing the results of the most recent reevaluation completed for a student, and a parent presents a doctor's note about the child which was not previously revealed to the IEP team. The doctor's note includes a medical diagnosis of psychosis and outlines symptoms that the student does not exhibit in the school setting. The parent insists that the child be provided accommodations based upon this doctor's note. What do you do?

- Remember: what phase of the process are we in?
- What is the standard?
- How should we apply these facts to the standard?

GRADUATION:
The Measure of Tomorrow

65TH CONFERENCE ON EXCEPTIONAL CHILDREN

SUGGESTIONS FOR SERVING STUDENTS WITH MENTAL HEALTH DISORDERS

- Clarify the role of school professionals.
- Increase access to mental health services while maintaining clear distinction between mental health providers and the school system.
- Provide training for teachers regarding addressing student mental health issues.
- Coordinate with parents and community programs.
- Provide skills training for students with minimal coping skills.
- ALWAYS ENSURE SAFETY!!

GRADUATION:
The Measure of Tomorrow

65TH CONFERENCE ON EXCEPTIONAL CHILDREN

65TH CONFERENCE ON EXCEPTIONAL CHILDREN

GRADUATION:
The Measure of Tomorrow

The End!

PUBLIC SCHOOLS OF NORTH CAROLINA
State Board of Education | Department of English Education

November 18-20, 2015